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Agriculture Division

Crop Protection Products

January 9th, 2002

EPA

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Office of Pesticides Programs (H7504C)
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1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Mary Waller
Product Manager for Team 21

Subject: 1,2,4-Triazole, Triazolylalanine and Triazolyl acetic acid

Dear Mrs. Waller:

On behalf of the Triazolylalanine Group [TAG], which includes the following U.S. Company entities: Bayer Corporation, Syngenta, Dow AgroSciences LLC, BASF Corporation, and Sipcam Agro USA, Inc., we are herewith submitting a comprehensive report covering multiple aspects about what is known about the primary metabolites common to the triazole-derivative class of fungicides.

A substantial amount of information and data on these metabolites has been acquired and compiled by the TAG members. From this, a clear understanding about the dynamics of the three metabolites has emerged. Through this consolidated report, it is the purpose and intent of the TAG to summarize all that is currently known about the three primary, common metabolites of the T-D fungicides in order to present a clear perspective about the relationship of these metabolites to the parent T-D compounds, as well as their contribution to the risk/hazard from the use of the T-D compounds.

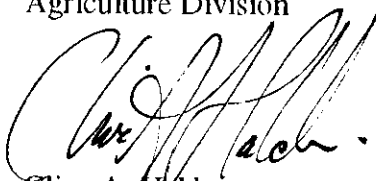
Please note that the information and data contained in this document belong to the members of the Triazolylalanine Group (TAG). Some of the information/data are company-specific, the remainder is co-owned with access rights granted through contractual agreements. As such, the TAG maintains the exclusivity of this information for the benefit of its membership and their respective triazole-derivative compounds only.

Ms. Mary Waller
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If there should be any questions concerning the content of this report, please do not hesitate to call me.

Sincerely,
BAYER CORPORATION
Agriculture Division



Clive A. Halder
Manager, Registrations & Administration

cc. Michele Schulz, Syngenta
Thomas Nelsen, BASF
John French, Sipcam
Douglas Roby, Dow AgroSciences
Rick Keigwin, EPA
Dietmar Dehne, Bayer AG
Melvin Tolliver, Bayer Corporation

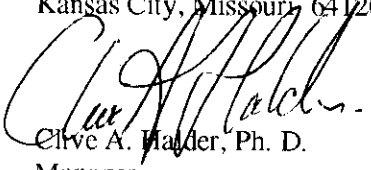
Enclosure:

Profile of the Triazole-derivative Fungicide Compounds and their Common
Metabolites, Bayer Report No. 200020, 566p. (3 copies)

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter:

BAYER CORPORATION
Agriculture Division
P.O. Box 4913
Kansas City, Missouri 64120


Elve A. Wadler, Ph. D.
Manager
Registrations and Administrations
(816) 242-2110

2. Regulatory Action in Support of Which This Package is Submitted:

1,2,4-Triazole [CAS: 288-88-0], triazolylalanine and triazolyl acetic acid.
Omnibus report covering information about the risk/hazard of the primary metabolites common to the triazole-derivative compounds.

3. Transmittal Date: January 9, 2001

4. List of Submitted Studies:

MRID No. Study No.

45575501

Profile of Triazole-derivative Fungicide Compounds and their Common Metabolites, EPA Guidance No.: None, Bayer Report No. 200020, Triazolylalanine Group, 566p.